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**Hearing Date: May 11, 2016**

**Hearing Time: 11:00 a.m. (EST)**

*Counsel for the Aramid Distribution Trust*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

ARAMID ENTERTAINMENT FUND  
LIMITED, *et al.*

Debtors.

Chapter 11

Case No.: 14-11802 (SHL)

(Jointly Administered)

ARAMID ENTERTAINMENT FUND  
LIMITED,

Plaintiff,

v.

DAVID MOLNER, ARAMID CAPITAL  
PARTNERS LLP; SCREEN CAPITAL  
INTERNATIONAL CORP. and GENCO  
CAPITAL CORP.,

Defendants.

Adv. Pro. No. 16-01025-shl

**DECLARATION OF JORDAN W. SIEV**

**JORDAN W. SIEV**, an attorney duly admitted to practice law in the State of New York  
and in the Courts of this District, declares under penalty of perjury, as follows:

1. I am a partner at the law firm of Reed Smith LLP, counsel to the Aramid Distribution Trust (the “Distribution Trust”), as success in interest to Aramid Entertainment Fund Limited (“AEF” or the “Fund”), Plaintiff in this Adversary Proceeding. I submit this Declaration in support of the Distribution Trust’s opposition to Defendants’ motion to compel arbitration.

2. A true and correct copy of the Adversary Complaint,<sup>1</sup> dated February 9, 2016, is attached hereto as Exhibit A.

3. A true and correct copy of the 2006 Services Agreement between ACP and AEF is attached hereto as Exhibit B.

4. A true and correct copy of the 2011 Services Agreement between ACP and AEF, is attached hereto as Exhibit C.

5. A true and correct copy of the Omnibus Settlement Agreement, dated August 29, 2014, is attached hereto as Exhibit D.

6. A true and correct copy of the Order Approving Modified Settlement Agreement, dated December 23, 2014, is attached hereto as Exhibit E.

7. A true and correct copy of the Disclosure Statement, dated November 13, 2015, is attached hereto as Exhibit F.

8. A true and correct copy of the Stroock Settlement Agreement, dated August 17, 2015, is attached hereto as Exhibit G.

9. A true and correct copy of Debtors’ Plan, dated January 28, 2016, is attached hereto as Exhibit H.

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<sup>1</sup> Capitalized terms shall have the same meaning as those in the Opposition.

10. A true and correct copy of the Voting Stipulation, dated February 16, 2016, is attached hereto as Exhibit I.

11. A true and correct copy of the Confirmation Order, dated February 19, 2016, is attached hereto as Exhibit J.

12. A true and correct copy of the Declaration of David Bergstein in Support of Chapter 7 Trustee's Motion for Order to Show Cause re Contempt of David Molner filed in Tregub II, dated June 20, 2014, is attached hereto as Exhibit K.

13. A true and correct copy the Contempt Motion, dated June 20, 2014, is attached hereto as Exhibit L.

14. A true and correct copy of Central District of California Local Bankruptcy Rule 7026-1(c)(3) Joint Stipulation accompanying the Contempt Motion, dated June 20, 2014, is attached hereto as Exhibit M.

15. A true and correct copy of the adversary complaint filed against David Molner in Tregub I, styled *David Bergstein v. David Molner*, Case No. 15-ap-01157-VK, dated August 25, 2015, is attached hereto as Exhibit N.

16. A true and correct copy of excerpts from the Confirmation Hearing Transcript, held on February 9, 2016, is attached hereto as Exhibit O.

17. Finally, the Distribution Trust is not opposing Defendants' Motion to Seal Exhibit G to the Declaration of David Molner in support of Defendants' Motion to Compel Mandatory Arbitration Pursuant to Contract. [ECF No. 10].

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: New York, New York  
May 4, 2016

/s/ *Jordan W. Siev*

JORDAN W. SIEV